

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM PARKER)	No. 2:23-cv-2102
)	
Plaintiff,)	
)	
v.)	JURY TRIAL DEMANDED
)	
EDWARD C. GAINEY, et al.)	
)	
Defendants.)	

**MOTION FOR EXTENSION TO FILE OMNIBUS BRIEF IN RESPONSE TO DEFENDANTS’
MOTIONS TO DISMISS**

1. On December 13, 2023, Plaintiff William Parker, filed suit against the City of Pittsburgh (“City”) and other individual defendants pro se alleging violations of his constitutional rights pursuant to U.S.C. § 1983. (ECF No. 1).
2. On or about September 24, 2024, following a meet and confer with counsel for all defants, a second amended complaint was filed by Mr. Parker. (ECF No. 43).
3. On October 8, 2024, a motion to dismiss for failure to state a claim was filed by the City of Pittsburgh and Defendant Gainey. (ECF Nos. 44 & 46). A partial motion to dismiss was filed on behalf of Police Officers Ferrilli, Kerry Ford, Michael Gay, Larry Sciroto. (ECF No. 48). Mr. Parker was ordered to file a brief in response on or before October 31, 2024. (ECF No. 50).
4. On October 15, 2024, a motion to dismiss for failure to state a claim was filed as to Ms. Hallam. (ECF No. 51). Mr. Parker was ordered to file an omnibus brief in response to the Defendants’ motions on or before October 31, 2024 (ECF No. 53).
5. Undersigned counsel requires additional time to respond to the multiple motions to dismiss for failure to state a claim.

6. Undersigned counsel has attempted to meet the deadline set by this Honorable Court however due to an injury and out of state travel is unable to do so.
7. Undersigned counsel is out of state with limited access to necessary resources and will not return until November 4, 2024.
8. Undersigned counsel requested consent for an extension from Attorney Brad Korinski representing Ms. Hallam and Attorney Hillary Weaver for the City of Pittsburgh Defendants. Counsel for all parties consented.
9. A proposed order is attached.

WHEREFORE, the Plaintiff, William Parker, respectfully requests that this Honorable Court grant his request to an extension until November 14, 2024 to file the Omnibus brief in response.

Respectfully submitted,

SMT LEGAL

Date: October 25, 2024

/s/Ryan Nye Gailey
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